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11 **UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

12 MARTIN GOMEZ, an Individual,

13 Plaintiff,  
14 v.  
15

16 SUZUKI MOTOR CORPORATION, a  
17 Foreign Corporation, SUZUKI MOTOR OF  
18 AMERICA, INC., a Delaware Corporation,  
19 DOES I through X, and DOE  
20 CORPORATIONS I through X, inclusive,  
21

22 Defendants.

23 Case No.: 2:13-cv-01570-JAD-VCF

24 **STIPULATION TO STAY FURTHER  
PROCEEDINGS AND ORDER**

25 Plaintiff hereby moves this Court under F. R. Civ. P. 4(m) for an Order extending time  
26 for the service of the Complaint and Summons on Defendant SUZUKI MOTOR  
27 CORPORATION, a Foreign Corporation located in Shizuoka, Japan (“Suzuki Japan”). This  
Motion is based upon F. R. Civ. P. 4(m) and the attached Declaration of Ryan Alexander, Esq.

- 28
1. Plaintiff filed this action on August 29, 2013 and served Defendant SUZUKI MOTOR OF  
2 AMERICA, INC., a Delaware Corporation (“Suzuki America”). The defendant remaining to be  
3 served is the Japanese parent company of SUZUKI MOTOR OF AMERICA, INC.
  4. Plaintiff has retained Legal Language Services, a translation and process service company, to  
5 serve Suzuki Japan according to the Hague Convention.

3. The parties stipulated to the extension of time to file a responsive pleading, which was submitted on December 19, 2013 by Defendants' Nevada counsel of Feldman | Graf, P.C., and was ordered by this Court on December 20, 2013. This Court approved the first extension until February 25, 2014. A second motion to extend is pending.

4. Legal Language Services warns that service in Japan will take up to five months to complete.

5. If discovery proceeds now, it will create difficulties in scheduling discovery and trial deadlines at this time because of duplicative work between related but distinct corporate entities.

6. Accordingly, it would be appropriate to stay the proceedings for up to five months and set a telephonic status check in 120-150 days.

## THE FIRM P.C.

FELDMAN GRAF P.C.

/s/ Ryan Alexander  
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Nevada Bar No. 10845  
*Attorney for Plaintiff*

/s/**David J. Feldman**  
David J. Feldman, Esq.  
Nevada Bar No. 5947  
*Attorney for Defendants*

## ORDER

For the reasons set forth above, this matter is stayed for 150 days for the completion of Hague Convention compliant service on Defendant Suzuki Motor Corporation. A status check will be set for August 15, 2014 at 10:00 AM/PM to review case status.

The time to serve Defendant Suzuki Motor Corporation is extended to August 8, 2014.

IT IS FURTHER ORDERED that Plaintiff's Motion to Extend Time for Service on Defendant Suzuki Motor Corporation (#11) is DENIED as MOOT.

Dated: March 14, 2014

*Carl Gaddis*

**UNITED STATES DISTRICT COURT**  
**JUDGE Magistrate**